

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 17-cr-116-RM

UNITED STATES OF AMERICA,

2:25-mj-02366-DUTY

Plaintiff,

v.

1. JOSE TAPIA-RUBIO,
a.k.a. "Don Chaquetas,"
2. JUAN CARLOS MEDINA-SOBERANIS,
3. LARA ZAMORA-CRUZ,
a.k.a. "Maria Lara-Reyes,"
4. ERIK PARRA,
a.k.a. "Flaco,"
5. JOSE CHICA-ORELLANA,
a.k.a. "Adrian,"
6. SELESTINO HERNANDEZ-MAYO,
a.k.a. "Chakichan,"
7. CLAUDIA LISSETH-LARA,
8. VILMA L. ZAMORA,
9. FREDY PAZ-HERRERA,
a.k.a. "Avispero,"
10. FIRST NAME UNKNOWN, LAST NAME UNKNOWN,
a.k.a. "Bancholas,"
11. RODRIGO MORA-SANCHEZ,
a.k.a. "Pelon,"
12. OSCAR MORA-CAMPOS,
13. EDUARDO JIMENEZ-SANCHEZ,
14. FIRST NAME UNKNOWN, LAST NAME UNKNOWN,
a.k.a. "Changuito,"
15. FIRST NAME UNKNOWN, LAST NAME UNKNOWN,
a.k.a. "UM-9584,"
16. LEOPOLDO RODRIGUEZ-PADILLA,
17. HEBERTO MORA-SANCHEZ,
a.k.a. "Chaparro,"

Defendants.

CHARGING STATUTES

18 U.S.C. § 2
18 U.S.C. § 1952(a)(3)(A)
18 U.S.C. § 1956(a)(3)
18 U.S.C. § 982(a)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(ii)(II)
21 U.S.C. § 841(b)(1)(B)(ii)(II)
21 U.S.C. § 841(b)(1)(A)(viii)
21 U.S.C. § 841(b)(1)(B)(viii)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b) and 843(d)
21 U.S.C. § 846
21 U.S.C. § 848
21 U.S.C. § 952(a)
21 U.S.C. § 853.
21 U.S.C. § 960(a)(1)
21 U.S.C. § 960(b)(2)(B)(ii)
31 U.S.C. § 5332

COUNT ONE

On or about and between February 1, 2016 and April 15, 2017, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendant JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," did knowingly or intentionally engage in a continuing criminal enterprise in that the defendant committed violations of Title 21, United States Code, Sections 841(a)(1), 843, and 846, including but not limited to the violations set forth in Counts Two through Five, Counts Seven through Nine, Counts Eleven through Eighteen, Counts Twenty through Thirty-Two, Count Thirty-Five, Count Thirty-Seven, and Counts Thirty-Nine through Forty-Two of this Indictment, which violations were part of a continuing series of violations of those statutes undertaken by the defendant in concert with five or more other persons, with respect to whom the

defendant occupied a position of organizer, supervisor or manager, and from which continuing series of violations the defendant obtained substantial income and resources.

All in violation of Title 21, United States Code, Sections 848(a) and 848(c).

COUNT TWO

On or about and between February 1, 2016 and April 15, 2017, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," JUAN CARLOS MEDINA-SOBERANIS, LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," ERIK PARRA, a.k.a. "Flaco," JOSE CHICA-ORELLANA, a.k.a. "Adrian," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," CLAUDIA LISSETH-LARA, VILMA L. ZAMORA, FREDY PAZ-HERRERA, a.k.a. "Avispero," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," RODRIGO MORA-SANCHEZ, a.k.a. "Pelon," OSCAR MORA-CAMPOS, EDUARDO JIMENEZ-SANCHEZ, FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Changuito," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "UM-9584," LEOPOLDO RODRIGUEZ-PADILLA, HEBERTO MORA-SANCHEZ, a.k.a. "Chaparro," and others both known and unknown to the Grand Jury, did knowingly or intentionally conspire to distribute and possess with the intent to distribute one or more of the following controlled substances: (1) 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled

Substance, (3) 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II), 841(b)(1)(A)(viii) and 846.

COUNT THREE

On or about March 3, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about March 29, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about April 21, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIX

On or about and between May 19, 2016 and May 23, 2016, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendant LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," did travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 18, United States Code, Section 1952(a)(3)(A).

COUNT SEVEN

On or about June 1, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, one or more of the following controlled substances; (1) less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, (2) less than 50 grams of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about July 7, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT NINE

On or about July 8, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," ERIK PARRA, a.k.a. "Flaco," JOSE CHICA-ORELLANA, a.k.a. "Adrian," and SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," did knowingly or intentionally distribute, and possess with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, and a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and Title 18, United States Code, Section 2.

COUNT TEN

On or about July 16, 2016, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants CLAUDIA LISSETH-LARA and VILMA L. ZAMORA did travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 18, United States Code, Section and 1952(a)(3)(A).

COUNT ELEVEN

On or about July 16, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," CLAUDIA LISSETH- LARA and VILMA L. ZAMORA, did knowingly or intentionally distribute, and possess with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about July 17, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," CLAUDIA LISSETH- LARA and VILMA L. ZAMORA, with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States.

All in violation of Title 31, United States Code, Section 5332.

COUNT THIRTEEN

On or about July 20, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," JOSE CHICA-ORELLANA, a.k.a. "Adrian," and SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about July 24, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and FREDY PAZ-HERRERA, a.k.a. "Avispero," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about August 1, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the

intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

On or about August 3, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

On or about August 17, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and FREDY PAZ-HERRERA, a.k.a. "Avispero," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

On or about August 26, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," JOSE CHICA-ORELLANA, a.k.a. "Adrian," and SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," did knowingly or intentionally distribute, and possess with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and Title 18, United States Code, Section 2.

COUNT NINETEEN

On or about and between August 24, 2016, and August 28, 2016, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," and VILMA L. ZAMORA, did travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 18, United States Code, Section and 1952(a)(3)(A).

COUNT TWENTY

On or about August 28, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," and VILMA L. ZAMORA, did knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

On or about August 29, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," and VILMA L. ZAMORA, with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States.

All in violation of Title 31, United States Code, Section 5332.

COUNT TWENTY-TWO

On or about September 9, 2016, within the State and District of Colorado, the defendants, JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and FREDY PAZ-HERRERA, a.k.a. "Avispero," did knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment.

All in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-THREE

On or about September 14, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

On or about September 17, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and FREDY PAZ-HERRERA, a.k.a. "Avispero," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a

detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

On or about September 20, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

On or about October 6, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and FREDY PAZ-HERRERA, a.k.a. "Avispero," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

On or about October 14, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," and OSCAR MORA-CAMPOS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

On or about October 20, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

On or about October 30, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," and OSCAR MORA-CAMPOS, did knowingly or intentionally

distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY

On or about October 30, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," and EDUARDO JIMENEZ-SANCHEZ, did knowingly or intentionally distribute, and possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B(ii)(II) and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

On or about October 30, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," and FREDY PAZ-HERRERA, a.k.a. "Avisperso," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a

Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

On or about November 3, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and JUAN CARLOS MEDINA-SOBERANIS, and SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," did knowingly or intentionally distribute, and possess with the intent to distribute, one or more of the following controlled substances: (1) less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 5 grams or more of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II Controlled Substance; (3) 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

On or about November 8, 2016, within the State and District of Colorado and elsewhere, the defendants RODRIGO MORA-SANCHEZ, a.k.a. "Pelon," FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "UM-9584," and FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "Changuito," did knowingly or intentionally import into

the United States, from a place outside of the United States, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(2)(B)(ii), and Title 18, United States Code, Section 2.

COUNT THIRTY-FOUR

On or about and between November 10, 2016, and November 12, 2016, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendant LEOPOLDO RODRIGUEZ-PADILLA did travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 18, United States Code, Section and 1952(a)(3)(A).

COUNT THIRTY-FIVE

On or about November 12, 2016, within the State and District of Colorado, the defendants RODRIGO MORA-SANCHEZ, a.k.a. "Pelon," FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "UM-9584," FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "Changuito," LEOPOLDO RODRIGUEZ-PADILLA, JOSE TAPIA-

RUBIO, a.k.a. "Don Chaquetas," and SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," did knowingly or intentionally distribute, and possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B(ii)(II) and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

On or about November 12, 2016, within the State and District of Colorado, the defendant ROBERTO MORA-SANCHEZ, FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "UM-9584," FIRST NAME UNKNOWN LAST NAME UNKNOWN, a.k.a. "Changuito," and LEOPOLDO RODRIGUEZ-PADILLA with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States. All in violation of Title 31, United States Code, Section 5332.

COUNT THIRTY-SEVEN

On or about November 22, 2016, within the State and District of Colorado, the defendants, JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," JOSE CHICA-ORELLANA, a.k.a. "Adrian," and OSCAR MORA-CAMPOS, did knowingly or intentionally use a communications device,

specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment.

All in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT THIRTY-EIGHT

On or about and between November 22, 2016, and November 23, 2016, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants LARA ZAMORA-CRUZ a.k.a. "Maria Lara-Reyes," and CLAUDIA LISSETH-LARA, did travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically, conspiracy to distribute or possess with the intent to distribute narcotics, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically, conspiracy to distribute or possess with the intent to distribute narcotics, as alleged in Count Two of this Indictment, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 18, United States Code, Section and 1952(a)(3)(A).

COUNT THIRTY-NINE

On or about November 23, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," and CLAUDIA LISSETH-LARA, did knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance

containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2.

COUNT FORTY

On or about December 8, 2016, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and HEBERTO MORA-SANCHEZ, a.k.a. "Chaparro," did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-ONE

On or about January 26, 2017, within the State and District of Colorado, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and HEBERTO MORA-SANCHEZ, a.k.a. "Chaparro," did knowingly or intentionally distribute, and possess with the intent to distribute one or more of the following controlled substances: (1) 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers; (2) less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(B)(viii) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-TWO

On or about March 9, 2017, within the State and District of Colorado, the
defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," and HEBERTO MORA-
SANCHEZ, a.k.a. "Chaparro," did knowingly or intentionally distribute, and possess with
the intent to distribute, less than 500 grams of a mixture or substance containing a
detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or
intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNTS FORTY-THREE THROUGH FIFTY-THREE

On or about the dates set forth below, within the State and District of Colorado,
the defendants, as specifically identified below, with the intent to promote the carrying
on of a specified unlawful activity, specifically the conspiracy alleged in Count Two of
this Indictment, conducted, or attempted to conduct a financial transaction represented
to be the proceeds of specified unlawful activity or property used to facilitate the
specified unlawful activity or did knowingly and intentionally aid, abet, counsel,
command, induce, or procure the same.

Ct	DEFENDANT(S)	Date	Transmission	Total	Sending Agent	State	Payee	Payment Location
43	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	4/26/2016	US59912382	800.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cancun Mexico
44	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	6/1/2016	US104738782	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cancun Mexico

45	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	7/7/2016	US177503862	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
46	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	8/3/2016	US227347082	2200.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cancun Mexico
47	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	9/14/2016	US280907382	1000.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
48	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	9/20/2016	US289599382	800.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
49	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	10/20/2016	US328662682	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
50	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	11/3/2016	US360005682	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
51	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	12/8/2016	US425258582	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
52	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	1/26/2017	US487814282	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico
53	Jose Tapia-Rubio Juan Carlos Medina- Soberanis	3/9/2017	US576271182	400.00	El Rancho Market Inc.	Colorado	Juan Carlos Medina Soberanis	Cenotillo Mexico

All in violation of Title 18, United States Code, Sections 2 and 1956(a)(3)(A).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Forty-Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. The allegations contained in Forty-Three through Fifty-Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

Upon conviction of the violations alleged in Counts One through Forty-Two of this Indictment, including violations of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii)(II), 841(b)(1)(B)(ii)(II), 841(b)(1)(A)(viii), 841(b)(1)(B)(viii), 841(b)(1)(C), 843(b) and 843(d), 846, and 848, the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," JUAN CARLOS MEDINA-SOBERANIS, LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes,"

ERIK PARRA, a.k.a. "Flaco," JOSE CHICA-ORELLANA, a.k.a. "Adrian," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," CLAUDIA LISSETH-LARA, VILMA L. ZAMORA, FREDY PAZ-HERRERA, a.k.a. "Avispero," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," RODRIGO MORA-SANCHEZ, a.k.a. "Pelon," OSCAR MORA-CAMPOS, EDUARDO JIMENEZ-SANCHEZ, FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Changuito," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "UM-9584," LEOPOLDO RODRIGUEZ-PADILLA, HEBERTO MORA-SANCHEZ, a.k.a. "Chaparro," shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendants' right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offense, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to:

1. A money judgment in the amount of \$2,000,000.00 obtained by the conspiracy and by the defendants, for which the defendants are joint and severally liable.

Upon conviction of the violations alleged in Forty-Three through Fifty-Three of this Indictment, including violations of Title 18, United States Code, Sections 1956(a)(3), the defendants JOSE TAPIA-RUBIO, a.k.a. "Don Chaquetas," JUAN CARLOS MEDINA-SOBERANIS, LARA ZAMORA-CRUZ, a.k.a. "Maria Lara-Reyes," ERIK PARRA, a.k.a. "Flaco," JOSE CHICA-ORELLANA, a.k.a. "Adrian," SELESTINO HERNANDEZ-MAYO, a.k.a. "Chakichan," CLAUDIA LISSETH-LARA, VILMA L. ZAMORA, FREDY PAZ-HERRERA, a.k.a. "Avispero," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Bancholas," RODRIGO MORA-SANCHEZ, a.k.a. "Pelon,"

OSCAR MORA-CAMPOS, EDUARDO JIMENEZ-SANCHEZ, FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "Changuito," FIRST NAME UNKNOWN, LAST NAME UNKNOWN, a.k.a. "UM-9584," LEOPOLDO RODRIGUEZ-PADILLA, HEBERTO MORA-SANCHEZ, a.k.a. "Chaparro," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) any and all of the defendants' right, title and interest in all property, real or personal, involved in such offense, or all property traceable to such property, including, but not limited to:

1. A money judgment in the amount of \$2,000,000.00 obtained by the conspiracy and by the defendants, for which the defendants are joint and severally liable.

If any of the property described above, as a result of any act or omission of the defendant(s);

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 18, United States Code, Section 982, to seek forfeiture of any other property of said defendant[s] up to the value of the forfeitable property.

All in violation of Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Section 853.

A TRUE BILL

Ink signature on file in Clerk's Office
FOREPERSON

APPROVED:

Robert C. Troyer,
Acting United States Attorney
District of Colorado

By: s/Stephanie Podolak
Stephanie Podolak
Assistant United States Attorney
U.S. Attorney's Office
1801 California Street, Suite 1600
Denver, CO. 80202
Telephone (303) 454-0309
Fax (303) 454-0401
Stephanie.podolak@usdoj.gov
Attorney for the Government

DEFENDANT 1: JOSE TAPIA-RUBIO,
a/k/a "Don Chequetas"

YEAR OF BIRTH: 1959

ADDRESS: 12091 East Arizona Avenue
Aurora, Colorado 80012

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT ONE:** Title 21, United States Code, Sections 848(a) and 848(c)
Continuing Criminal Enterprise

COUNT TWO: Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(A)(ii)(II), 841(b)(1)(A)(viii) and 846 - Conspiracy to distribute and
possess with the intent to distribute one or more of the following controlled
substances: (1) 5 kilograms or more of a mixture or substance containing
a detectable amount of cocaine, a Schedule II Controlled Substance; (2)
50 grams or more of methamphetamine, its salts, isomers, and salts of its
isomers, a Schedule II Controlled Substance, (3) 500 grams or more of a
mixture or substance containing a detectable amount of
methamphetamine, its salts, isomers, and salts of its isomers, a Schedule
II Controlled Substance:

**COUNTS THREE, FOUR, FIVE, SEVEN, EIGHT, THIRTEEN,
FOURTEEN, FIFTEEN, SIXTEEN, SEVENTEEN, TWENTY-THREE,
TWENTY-FOUR, TWENTY-FIVE, TWENTY-SIX, TWENTY-SEVEN,
TWENTY-NINE, THIRTY-ONE, THIRTY-TWO, FORTY, FORTY-ONE,
AND FORTY-TWO:** Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly
or intentionally distribute, and possess with the intent to distribute, less
than 500 grams of a mixture or substance containing a detectable amount
of cocaine, a Schedule II Controlled Substance and did knowingly or
intentionally aid, abet, counsel, command, induce or procure the same

COUNT SIX: Title 18, United States Code, Section 1952(a)(3)(A) -
travel in interstate commerce with the intent to promote, manage,
establish, carry on, or facilitate the promotion, management,
establishment, or carrying on, of an unlawful activity, specifically
conspiracy to distribute or possess with the intent to distribute narcotics as
alleged in Count Two of this Indictment, and thereafter performed or
attempted to perform an act to promote, manage, establish, carry on, or

facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNTS NINE, ELEVEN, EIGHTEEN, THIRTY AND THIRTY-FIVE:

Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS TWELVE AND TWENTY-ONE: Title 31, United States Code, Section 5332 – intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

COUNTS TWENTY AND THIRTY-NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS TWENTY-TWO AND THIRTY-SEVEN: Title 21, United States Code, Sections 843(b) and 843(d) - knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment

COUNTS FORTY-THREE through FIFTY-THREE: Title 18, United States Code, Sections 2 and 1956(a)(3)(A) - intent to promote the carrying on of a specified unlawful activity, specifically the conspiracy alleged in Count Two of this Indictment, conducted, or attempted to conduct a financial transaction represented to be the proceeds of specified unlawful activity or property used to facilitate the specified unlawful activity or did knowingly and intentionally aid, abet, counsel, command, induce, or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT ONE:** 20 years to life imprisonment, 5 years Supervised Release, \$2,000,000.00 fine, \$100 Special Assessment Fee

COUNT TWO: NLT 10 years or more than life in prison, 5 years of supervised release, \$10,000,000 fine, \$100 Special Assessment Fee

COUNTS THREE, FOUR, FIVE, SEVEN, EIGHT, THIRTEEN, FOURTEEN, FIFTEEN, SIXTEEN, SEVENTEEN, TWENTY-THREE, TWENTY-FOUR, TWENTY-FIVE, TWENTY-SIX, TWENTY-SEVEN, TWENTY-NINE, THIRTY-ONE, THIRTY-TWO, FORTY, FORTY-ONE, AND FORTY-TWO: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine; \$100 Special Assessment Fee (per count)

COUNT SIX: NMT 5 years in prison, 3 years of supervised release, \$250,000.00 fine, \$100 Special Assessment Fee

COUNTS NINE, ELEVEN, EIGHTEEN, THIRTY AND THIRTY-FIVE: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee (per count)

COUNTS TWELVE AND TWENTY-ONE: NMT 5 years in prison, NMT 3 years supervised release, not more than \$250,000.00 fine; \$100 Special Assessment Fee (per count)

COUNTS TWENTY AND THIRTY-NINE: NLT 10 years and NMT life in prison, 5 years of supervised release, \$5,000,000 fine; \$100 Special Assessment Fee (per count)

COUNTS TWENTY-TWO AND THIRTY-SEVEN: Not more than 4 years in prison, not more than 1 year supervised release, not more than \$250,000.00 fine, \$100 Special Assessment Fee (per count)

COUNTS FORTY-THREE through FIFTY-THREE: Maximum term of imprisonment: 20 years; 3 years Supervised Release; Maximum fine: Not more than \$500,000.00000 or twice the value of the property involved in the money laundering transactions

Forfeiture

AGENT: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 2: JUAN CARLOS MEDINA-SOBERANIS

YEAR OF BIRTH: 1986

ADDRESS: Mexico

COMPLAINT FILED? _____ YES X NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES X NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II), 841(b)(1)(A)(viii) and 846 - Conspiracy to distribute and possess with the intent to distribute one or more of the following controlled substances: (1) 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance, (3) 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance:

COUNTS THREE, FOUR, FIVE, SEVEN, EIGHT, FIFTEEN, SIXTEEN, TWENTY-THREE TWENTY-FIVE AND TWENTY-EIGHT: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-TWO: Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and 841(b)(1)(C) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute, one or more of the following controlled substances: (1) less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 5 grams or more of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II Controlled Substance; (3) 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS FORTY-THREE through FIFTY-THREE: Title 18, United States

Code, Sections 2 and 1956(a)(3)(A) - intent to promote the carrying on of a specified unlawful activity, specifically the conspiracy alleged in Count Two of this Indictment, conducted, or attempted to conduct a financial transaction represented to be the proceeds of specified unlawful activity or property used to facilitate the specified unlawful activity or did knowingly and intentionally aid, abet, counsel, command, induce, or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years or more than life in prison, 5 years of supervised release, \$10,000,000 fine, \$100 Special Assessment Fee

COUNTS THREE, FOUR, FIVE, SEVEN, EIGHT, FIFTEEN, SIXTEEN, TWENTY-THREE TWENTY-FIVE AND TWENTY-EIGHT: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine; \$100 Special Assessment Fee (per count)

COUNT THIRTY-TWO: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, **\$100 Special Assessment Fee (per count)**

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT will seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 3: LARA ZAMORA-CRUZ,
a/k/a Maria Lara-Reyes

YEAR OF BIRTH: 1953

ADDRESS: 18298 Nordhoff Street
Northridge, CA 91325

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II), 841(b)(1)(A)(viii) and 846 - Conspiracy to distribute and possess with the intent to distribute one or more of the following controlled substances: (1) 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance, (3) 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance:

COUNTS SIX, NINETEEN AND THIRTY-EIGHT: Title 18, United States Code, Section 1952(a)(3)(A) - travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT ELEVEN: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS TWELVE AND TWENTY- ONE: Title 31, United States Code, Section 5332 – intent to evade the currency reporting requirement under

Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

COUNTS TWENTY AND THIRTY-NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years or more than life in prison, 5 years of supervised release, \$10,000,000 fine, \$100 Special Assessment Fee

COUNTS SIX, NINETEEN AND THIRTY-EIGHT: NMT 5 years in prison, 3 years of supervised release, \$250,000.00 fine, \$100 Special Assessment Fee (per count)

COUNT ELEVEN: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

COUNTS TWELVE AND TWENTY-ONE: Maximum term of imprisonment: 20 years; 3 years Supervised Release; Maximum fine: NMT \$500,000.00000 or twice the value of the property involved in the money laundering transactions, \$100 Special Assessment Fee (per count)

COUNTS TWENTY AND THIRTY-ONE: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine; \$100 Special Assessment Fee (per count)

COUNT TWENTY-ONE: NMT 5 years in prison, NMT 3 years supervised release, not more than \$250,000.00 fine. \$100 Special Assessment Fee

COUNT THIRTY-EIGHT: Not more than 20 years in prison, 3 years of

supervised release, \$1,000,000 fine; \$100 Special Assessment Fee

COUNT THIRTY-NINE: NLT 10 years and NMT life in prison, 5 years of supervised release, \$5,000,000 fine; **\$100 Special Assessment Fee**

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 4: ERIK PARRA,
a.k.a. "Flaco"

YEAR OF BIRTH: 1990

ADDRESS: Unknown

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT NINE: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 5: JOSE CHICA-ORELLANA,
a.k.a. "Adrian"

YEAR OF BIRTH: 1979

ADDRESS: In ICE Custody

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNTS NINE AND EIGHTEEN: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTEEN: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-SEVEN: Title 21, United States Code, Sections - knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment

NOTICE OF FORFEITURE

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both;

NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS NINE AND EIGHTEEN: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, **\$100 Special Assessment Fee (per count)**

COUNT THIRTEEN: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, \$100 Special Assessment Fee

COUNT THIRTY-SEVEN: Not more than 4 years in prison, not more than 1 year supervised release, not more than \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENT: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 6: SELESTINO HERNANDEZ-MAYO,
a.k.a. "Chakichan"

YEAR OF BIRTH: 1971

ADDRESS: 4572 South Pagosa Circle
Aurora, CO 80015

COMPLAINT FILED? _____ YES ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNTS NINE, EIGHTEEN, THIRTY AND THIRTY-FIVE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS THIRTEEN TWENTY-SEVEN, TWENTY-NINE, THIRTY-ONE AND THIRTY-TWO: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT TWENTY: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-SEVEN: Title 21, United States Code, Sections 843(b) and 843(d) - knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS NINE, EIGHTEEN, THIRTY AND THIRTY-FIVE: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee (per count)

COUNTS THIRTEEN, TWENTY-SEVEN, TWENTY-NINE, THIRTY-ONE AND THIRTY-TWO: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, \$100 Special Assessment Fee (per count)

COUNT TWENTY: NLT 10 years and NMT life in prison, 5 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

COUNTS TWENTY-SEVEN, TWENTY-NINE, THIRTY-ONE AND THIRTY-TWO: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, \$100 Special Assessment Fee (per count)

COUNT THIRTY-SEVEN: NMT 4 years in prison, NMT 1 year supervised release, NMT \$250,000.00 fine, \$100 Special Assessment Fee

NOTICE OF FORFEITURE

AGENT: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 7: CLAUDIA LISSETH-LARA,

YEAR OF BIRTH: 1976

ADDRESS: 17346 Chatsworth Street, Apartment 118
Granada Hills, CA 91344

COMPLAINT FILED? _____ YES X NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES X NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY-EIGHT: United States Code, Section and 1952(a)(3)(A) travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846

COUNT THIRTY-NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO**: NLT 10 years, NMT life in prison, \$10 million fine, or both;
NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY-EIGHT: NMT 20 years in prison, 3 years of supervised
release, \$1,000,000 fine, \$100 Special Assessment Fee

COUNT THIRTY-NINE: NLT 10 years and NMT life in prison, 5 years of
supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 8: VILMA L. ZAMORA

YEAR OF BIRTH: 1950

ADDRESS: 7251 Amigo Avenue, Apartment 11
Reseda, CA 91335

COMPLAINT FILED? _____ YES ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNTS TEN AND NINETEEN: 18, United States Code, Section and 1952(a)(3)(A) travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846

COUNT ELEVEN: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and 18 USC § 2 - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNTS TWELVE AND TWENTY-ONE: Title 31, United States Code, Section 5332 – intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

COUNT TWENTY: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS TEN AND NINETEEN: NMT 5 years in prison, 3 years of supervised release, \$250,000.00 fine, \$100 Special Assessment Fee (per count)

COUNT ELEVEN: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, **\$100 Special Assessment Fee**

COUNTS TWELVE AND TWENTY-ONE: NMT 5 years in prison, NMT 3 years supervised release, not more than \$250,000.00 fine (per count)

COUNT TWENTY: NLT 10 years and NMT life in prison, 5 years of supervised release, \$5,000,000 fine; **\$100 Special Assessment Fee (per count)**

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT will seek detention in this case.
OCDETF case: Yes - WC CO 662

DEFENDANT 9: FREDY PAZ HERRERA
a.k.a. "Avispero"

YEAR OF BIRTH: 1977

ADDRESS: 9359 Highway 9, Unit B-103
Breckenridge, CO 80424

COMPLAINT FILED? _____ YES _____ ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT FOURTEEN, SEVENTEEN, TWENTY-FOUR, TWENTY-SIX AND THIRTY-ONE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

COUNT TWENTY-TWO: Title 21, United States Code, Sections 843(b) and 843(d) - knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment

NOTICE OF FORFEITURE

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO**: NLT 10 years, NMT life in prison, \$10 million fine, or both;
NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT FOURTEEN, SEVENTEEN, TWENTY-FOUR, TWENTY-SIX
AND THIRTY-ONE**: NMT 20 years in prison, 3 years of supervised
release, \$1,000,000 fine, \$100 Special Assessment Fee (per count)

COUNT TWENTY-TWO: NMT 4 years in prison, NMT 1 year supervised
release, NMT \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 10: FIRST NAME UNKNOWN, LAST NAME UNKNOWN,
a.k.a. "Bancholas"

YEAR OF BIRTH:

ADDRESS: Mexico

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNTS TWENTY AND THIRTY-NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II) and Title 18, United States Code, Section 2 - knowingly or intentionally distribute, and possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT TWENTY-ONE: Title 31, United States Code, Section 5332 - with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

NOTICE OF FORFEITURE

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS TWENTY AND THIRTY-NINE: NLT 10 years and NMT life in prison, 5 years of supervised release, \$5,000,000 fine; **\$100 Special Assessment Fee (per count)**

COUNT TWENTY-ONE: NMT 5 years in prison, NMT 3 years supervised release, NMT \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 11: RODRIGO MORA-SANCHEZ,
a/k/a Pelon

YEAR OF BIRTH: 1968

ADDRESS: 17994 East Utah Place
Aurora, Colorado 80017

COMPLAINT FILED? _____ YES _____ ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY-THREE: Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(2)(B)(ii), and Title 18, United States Code, Section 2 - knowingly or intentionally import into the United States, from a place outside of the United States, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

COUNT THIRTY-FIVE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and 18 USC § 2 - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY-THREE: NLT 5 years or more than 40 years in prison,
NMT 3 years supervised release, NMT \$5,000,000.00 fine, \$100 special
Assessment Fee

COUNT THIRTY-FIVE: NLT five years or more than life in prison, 4 years
of supervised release, \$5,000,000 fine, **\$100 Special Assessment Fee**

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 12: OSCAR MORA-CAMPOS

YEAR OF BIRTH: 1973

ADDRESS:

COMPLAINT FILED? _____ YES ____ X ____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? ____ YES ____ X ____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNTS TWENTY-SEVEN AND TWENTY-NINE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

COUNT THIRTY-SEVEN: Title 21, United States Code, Sections 843(b) and 843(d) - knowingly or intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count Two of this Indictment

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS TWENTY-SEVEN AND TWENTY-NINE: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, \$100 Special Assessment Fee (per count)

COUNT THIRTY-SEVEN: Not more than 4 years in prison, not more than 1 year supervised release, not more than \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 13: EDUARDO JIMENEZ-SANCHEZ,

YEAR OF BIRTH: 1979

ADDRESS: 253 Castle Ridge Drive
New Castle, CO 81647

COMPLAINT FILED? _____ YES _____ ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) and 18 USC § 2 - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY: NLT five years or more than life in prison, 4 years of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 14: FIRST NAME UNKNOWN, LAST NAME UNKNOWN
a.k.a. "Changuito"

YEAR OF BIRTH:

ADDRESS: Mexico

COMPLAINT FILED? _____ YES _____ X NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY-THREE: Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(2)(B)(ii), and Title 18, United States Code, Section 2 v- knowingly or intentionally import into the United States, from a place outside of the United States, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

COUNT THIRTY-FIVE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-SIX: Title 31, United States Code, Section 5332 - with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both;
NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY-THREE: NLT 5 years or NMT than 40 years in prison,
NMT 3 years supervised release, NMT \$5,000,000.00 fine, \$100 Special
Assessment Fee

COUNT THIRTY-FIVE: NLT five years or more than life in prison, 4 years
of supervised release, \$5,000,000 fine, **\$100 Special Assessment Fee**

COUNT THIRTY-SIX: NMT 5 years in prison, NMT 3 years supervised
release, not more than \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 15: FIRST NAME UNKNOWN, LAST NAME UNKNOWN
a.k.a "UM-9584"

YEAR OF BIRTH:

ADDRESS: Mexico

COMPLAINT FILED? _____ YES ____ X ____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? ____ YES ____ X ____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY-THREE: Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(2)(B)(ii), and Title 18, United States Code, Section 2 v- knowingly or intentionally import into the United States, from a place outside of the United States, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same.

COUNT THIRTY-FIVE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-SIX: Title 31, United States Code, Section 5332 - with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO**: NLT 10 years, NMT life in prison, \$10 million fine, or both;
NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY-THREE: NLT 5 years or NMT than 40 years in prison,
NMT 3 years supervised release, NMT \$5,000,000.00 fine, \$100 Special
Assessment Fee

COUNT THIRTY-FIVE: NLT five years or more than life in prison, 4 years
of supervised release, \$5,000,000 fine, \$100 Special Assessment Fee

COUNT THIRTY-SIX: NMT 5 years in prison, NMT 3 years supervised
release, not more than \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 16: LEOPOLDO RODRIGUEZ-PADILLA

YEAR OF BIRTH: 1988

ADDRESS: 1181 East Roe Avenue
Dinuba, CA 93618

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT THIRTY-FOUR: Title 21, United States Code, Section and 1952(a)(3)(A) travel in interstate commerce with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity, specifically conspiracy to distribute or possess with the intent to distribute narcotics as alleged in Count Two of this Indictment, and thereafter performed or attempted to perform an act to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of that unlawful activity in violation of Title 21, United States Code, Sections 841(a)(1) and 846

COUNT THIRTY-FIVE: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II) - Distribution or Possession with the Intent to Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine a Schedule II Controlled Substance, and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

COUNT THIRTY-SIX: Title 31, United States Code, Section 5332 - with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments on her person or in any conveyance, article of luggage, merchandise, or other container, and thereafter did transport or transfer, or did attempt to transport or transfer, such currency or monetary instruments from a place within the United States to a place outside the United States

NOTICE OF FORFEITURE

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO**: NLT 10 years, NMT life in prison, \$10 million fine, or both;
NLT 5 years supervised release, \$100 Special Assessment Fee

COUNT THIRTY-FOUR: NMT 5 years in prison, 3 years of supervised
release, \$250,000.00 fine, \$100 Special Assessment Fee

COUNT THIRTY-FIVE: NLT five years or more than life in prison, 4 years
of supervised release, \$5,000,000 fine, **\$100 Special Assessment Fee**

COUNT THIRTY-SIX: NMT 5 years in prison, NMT 3 years supervised
release, not more than \$250,000.00 fine, \$100 Special Assessment Fee

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662

DEFENDANT 17: HEBERTO MORA-SANCHEZ

YEAR OF BIRTH: 1973

ADDRESS: 15450 East Center Avenue, Apartment K-102
Aurora, CO 80017

COMPLAINT FILED? _____ YES ☒ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES ☒ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1)(A)(ii)(II), 841(a)(1)(A)(viii) and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, (1) 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; (2) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance, (3) 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance

COUNTS FORTY, FORTY-ONE AND FORTY-TWO: Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2 - did knowingly or intentionally distribute, and possess with the intent to distribute, less than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance and did knowingly or intentionally aid, abet, counsel, command, induce or procure the same

NOTICE OF FORFEITURE

LOCATION OF OFFENSE
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

COUNTS FORTY, FORTY-ONE, AND FORTY-TWO: NMT 20 years in prison, 3 years of supervised release, \$1,000,000 fine, \$100 Special Assessment Fee (per count)

Forfeiture

AGENTS: Jason DeLuca, Task Force Officer
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 662